

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: :
SEYEDMOHAMMADALI ZAHRAEI, :
Debtor. : Case No: 21-33378
: Chapter 13

OBJECTION TO CONFIRMATION

The creditor Rahimeh Yousefi, by counsel, objects to confirmation of the Amended Chapter 13 Plan dated August 5, 2022, pursuant to Federal Rule of Bankruptcy Procedure 3015(f), Local Bankruptcy Rule 3015(E), and 11 U.S.C. § 1325(a)(1), (3), (6), (7), and (b)(1)(A), as follows:

1. The Chapter 13 Plan fails to address the priority claim of creditor Rahimeh Yousefi, Claim numbered 6-1, in Section 3(C).
2. Debtor's chapter 13 plan is underfunded and will not pay for all claims filed or listed. If this chapter 13 plan were fully funded as required by the Bankruptcy Code, the plan would not be feasible as required under 11 U.S.C. §1325(a)(6).
3. This chapter 13 plan has not been proposed in good faith and the action of the Debtor in filing the petition is not in good faith due to the failure of the Debtor to reveal his pending divorce case filed prepetition on July 14, 2021, in the Circuit Court of Henrico County, Virginia, Case Number CL21-004791, and his failure to list his wife as a creditor in his bankruptcy filing, despite the filing of her Answer and Counterclaim against him on August 6, 2021, demanding payment of the deferred mahr

200 Bahar Azadi gold coins owed her under the parties' Islamic marriage contract. Further, Debtor failed to list his divorce lawyer or the law firm for either a debt or a transfer of money pre-petition.

4. Rahimeh Yousefi reserves the right to raise additional supporting grounds to her objection at the confirmation hearing.

WHEREFORE, Rahimeh Yousefi prays this court sustain this objection to confirmation, deny confirmation of Debtor's chapter 13 plan, and enter such other orders, processes, or judgments that are necessary or appropriate to carry out the provisions of Title 11.

RAHIMEH YOUSEFI
By Counsel

Date: August 18, 2022

/s/James H. Wilson, Jr.
James H. Wilson, Jr.
Counsel for Rahimeh Yousefi
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PROOF OF SERVICE

I certify that I have this 18th day of August, 2022, served by ECF or first-class mail, postage prepaid this Objection on the following parties:

Carl M. Bates, Chapter 13 Trustee
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